

EXHIBIT D

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

“Track Three”

MDL No. 2804

Judge Dan Aaron Polster

RITE AID’S WITNESS LIST

Defendants Rite Aid Hdqtrs. Corp., Rite Aid of Ohio, Inc., Rite Aid of Maryland, Inc. d/b/a Rite Aid Mid-Atlantic Customer Support Center and Eckerd Corp. d/b/a Rite Aid Liverpool Distribution Center (“Rite Aid”) hereby disclose the following witnesses whom they may call to testify at trial. Rite Aid separately joins the Pharmacy Defendants’ Joint Witness List and reserves the right to offer the testimony of the witnesses listed there.

Rite Aid reserves the right to amend, supplement, or otherwise modify its witness list if new or modified information is provided at any point. Rite Aid further reserves the right to supplement and/or to amend this witness list in response to rulings of the Court on pretrial motions. Rite Aid reserves the right to supplement its witness list as it relates to prescribers and pharmacists pursuant to the Second Revised Case Management Order, Doc. 3735. Rite Aid reserves the right to call any of these witnesses in its case in chief. Rite Aid further incorporates all reservations in the Pharmacy Defendants’ Joint Witness list.

The witnesses on Rite Aid’s witness list may testify at trial live or by deposition. In addition to the witnesses identified below, Rite Aid may call to testify at trial live or by deposition any witness identified on any other party’s witness list, including witness lists

provided by Plaintiffs and other Defendants, including any party that settles, is severed, or is dismissed.

A. Expert Witnesses

1. Rite Aid expects to call expert witnesses, who are expected to testify about the subject matter of their reports, as well as their knowledge, education, and experience. Rite Aid will disclose its expert witnesses on June 25, 2021, consistent with the Second Revised Case Management Order, Doc. 3735.

B. Fact Witnesses

1. Christopher Belli, Rite Aid – Operations Senior Manager.

Areas of Testimony: Mr. Belli is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as an Operations Senior Manager, his previous relevant employment, and/or his previous deposition testimony in the MDL.

2. Kimberly Birklin, Rite Aid – DEA Coordinator.

Areas of Testimony: Ms. Birklin is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties, responsibilities, and experiences at Rite Aid distribution centers.

3. Richard Chapman, Rite Aid – Vice President, Logistics.

Areas of Testimony: Mr. Chapman is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as a Vice President of Logistics, his previous relevant employment, and/or related to his previous deposition testimony in the MDL.

4. Debra Chase, Rite Aid – Order Fulfillment Partner for Centralized Products.

Areas of Testimony: Ms. Chase is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties and responsibilities as an Order Fulfillment Partner for Centralized Products, her previous relevant employment, and/or her previous deposition testimony in the MDL.

5. Erin Desmond, Rite Aid – Pharmacist.

Areas of Testimony: Ms. Desmond is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties, responsibilities, and experiences as a Rite Aid pharmacist.

6. Keith Frost, Rite Aid – Manager of Centralized Products.

Areas of Testimony: Mr. Frost is expected to testify concerning matters related to the claims and defenses in this action, including

but not limited to matters related to his duties and responsibilities as a Manager of Centralized Products, related to his previous relevant employment, and/or his previous deposition testimony in the MDL.

7. Amanda Glover, Rite Aid – Vice President, Regulatory Affairs.

Areas of Testimony: Ms. Glover is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties, responsibilities, and experiences as Vice President of Regulatory Affairs.

8. Kirsten Gosnik, Rite Aid – Region Pharmacy Leader.

Areas of Testimony: Ms. Gosnik is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties, responsibilities, and experiences as a pharmacist, Pharmacy District Manager, Regional Healthcare Leader, Region Pharmacy Leader, and other roles at Rite Aid, and/or her previous deposition testimony in the MDL.¹

9. Janet Hart, Rite Aid – Director, Government Affairs.

Areas of Testimony: Ms. Hart is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties and responsibilities as the Director of Government Affairs, her other previous relevant employment and experience, and/or her previous deposition testimony in the MDL.

¹ Ms. Gosnik is a former employee.

10. Scott Jacobson, Rite Aid – Vice President, Pharmacy Operations.

Areas of Testimony: Mr. Jacobson is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as Vice President, Pharmacy Operations, his other previous relevant employment and experience, and/or his previous deposition testimony in the MDL.

11. Raja Machana, Rite Aid – Pharmacist.

Areas of Testimony: Mr. Machana is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties, responsibilities, and experiences as a Rite Aid pharmacist.

12. Kristina McKenzie, Rite Aid – Pharmacist.

Areas of Testimony: Ms. McKenzie is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties, responsibilities, and experiences as a Rite Aid pharmacist.

13. Brandan Mehaffie, Rite Aid – Director, Pharmacy Asset Protection.

Areas of Testimony: Mr. Mehaffie is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties, responsibilities, and experiences as Director of Pharmacy Asset Protection.

14. Kevin Mitchell, Rite Aid – Senior Director, Regulatory Compliance.

Areas of Testimony: Mr. Mitchell is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as Senior Director of Regulatory Compliance, his previous relevant employment, and/or his previous deposition testimony in the MDL.

15. Katherine Moldovan, Rite Aid – Region Pharmacy Leader.

Areas of Testimony: Ms. Moldovan is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties, responsibilities, and experiences as a pharmacist, Pharmacy District Manager, Regional Healthcare Leader, Region Pharmacy Leader, and other roles at Rite Aid.

16. Sophia Novack, Rite Aid – Director, Pharmacy Loss Prevention.

Areas of Testimony: Ms. Novack is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties and responsibilities as Director of Pharmacy Loss Prevention, her previous relevant employment, and/or her previous deposition testimony in the MDL.

17. Mark Obert, Rite Aid – Regional Retail Leader.

Areas of Testimony: Mr. Obert is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties, responsibilities, and experiences as an Asset Protection District Leader and Region Retail Leader.

18. Andrew Palmer, Rite Aid – Group Vice President, Compliance, Privacy, and Internal Assurance Services.

Areas of Testimony: Mr. Palmer is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as the Group Vice President of Compliance, Privacy, and Internal Assurance Services, his previous relevant employment, and/or his previous deposition testimony in the MDL.

19. Larry Ringgold, Rite Aid – DEA Coordinator for Security.

Areas of Testimony: Mr. Ringgold is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as the DEA Coordinator for Security, his previous relevant employment, and/or his previous deposition testimony in the MDL.

20. Ashley Thomas, Rite Aid – Pharmacist.

Areas of Testimony: Ms. Thomas is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties, responsibilities, and experiences as a Rite Aid pharmacist.

21. Donald Tush, DEA Diversion Investigator.²

Areas of Testimony: Mr. Tush is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as a Diversion Investigator for DEA, his previous relevant employment, and/or his previous deposition testimony in the MDL.

22. Marian Wood, Rite Aid – DEA Coordinator.

Areas of Testimony: Ms. Wood is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties and responsibilities

² This testimony at trial is expected to be by deposition.

as a DEA Coordinator, her previous relevant employment, and/or
related to her previous deposition testimony in the MDL.

Dated: June 15, 2021

Respectfully submitted,

/s/ Kelly A. Moore

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